

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

CRAIG JACKSON,

Plaintiff,

vs.

Case No. 2:22-cv-01185-LA

BRADLEY CORPORATION,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Civil Local Rule 7, Defendant Bradley Corporation (“Defendant”), by its attorneys, Foley & Lardner LLP, respectfully moves the Court for a two-week extension of time to answer, move, or otherwise respond to Plaintiff Craig Jackson’s (“Plaintiff’s”) Complaint in this matter. In support of its motion, Defendant states as follows:

1. On October 5, 2022, Plaintiff filed a Complaint alleging violations of the Fair Labor Standards Act of 1938, as amended ("FLSA"), and Wisconsin's Wage Payment and Collection Laws, Wis. Stat. § 109.01 *et seq.* [Dkt. 1.]

2. Defendant’s deadline to answer, move, or otherwise respond to the Complaint is currently Monday, December 5, 2022.

3. Defendant is working diligently to answer Plaintiff’s allegations but needs some additional time to prepare the response to Plaintiff’s Complaint.

4. Defendant’s counsel contacted Plaintiff’s counsel regarding Defendant’s requested two-week extension of time (to and including December 19, 2022) and Plaintiff does

not oppose Defendant's motion or the extension of the response deadline to and including December 19, 2022.

5. This request is made in good faith and will not cause undue delay or expense to the parties or to the Court. No party will be prejudiced by the granting of Defendant's unopposed motion.

WHEREFORE, Defendant Bradley Corporation respectfully requests that the Court grant its Unopposed Motion for Extension of Time to Respond to Plaintiff's Complaint and enter an order extending the deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint to and including December 19, 2022.

Dated: December 2, 2022.

/s/ Carmen N. Decot

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Attorneys for Defendant Bradley Corporation

CIVIL LOCAL RULE 7(a)(2) CERTIFICATE

Pursuant to Civil Local Rule 7(a)(2), the undersigned counsel for Defendant hereby certifies that no memorandum or other supporting papers will be filed with the foregoing motion.

Dated: December 2, 2022.

/s/ Carmen N. Decot

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